

**a. Ickes's Office Examines the Hudson Matter Internally
in Anticipation of the Wall Street Journal Article
Alleging Potential Impropriety in the Hudson Decision**

Sometime around July 1, 1996, the Wall Street Journal called Ickes seeking comment on the allegations of his role in Interior's denial of the Hudson application. Ickes did not comment, but gave one of his assistants, Thomas Shea, the task of looking into the Hudson issue. Shea had taken over Indian issues from Jennifer O'Connor when he began working for Ickes in April 1996, at which time he was briefed on the Hudson matter. Although O'Connor had been the staff person handling Hudson for Ickes in 1995, Ickes tasked Shea with gathering information to formulate a response to the Wall Street Journal, which Shea described as a pressing matter.

According to Shea, Ickes may have told him to check first with Jennifer O'Connor about the Hudson matter, which Shea did. O'Connor explained to Shea what she had done in connection with Hudson, including the fact that she had been the contact with DOI. Shea also called Robert Anderson at the Interior Solicitor's Office. Anderson provided Shea with background on the Hudson matter, including an opinion by Judge Crabb in the applicants' federal civil lawsuit. Shea ultimately went back to Ickes and asked Ickes whether he had ever spoken to Babbitt about the Hudson matter. Ickes told Shea that he had no recollection of talking to Babbitt about Hudson.

On July 3, 1996, Shea wrote a memorandum to Ickes containing the information Shea had gathered on the Hudson matter. Ickes met with Shea to go over the information in the memorandum. After the meeting, Ickes instructed Shea to call the Wall Street Journal to provide them with whatever information he could. Shea did so, and is quoted as Ickes's spokesman in the Wall Street Journal article: